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22 Attorneys for Defendant CARLOS GONZALEZ

23 (Additional Counsel on Subsequent Page)

24 UNITED STATES DISTRICT COURT
25 CENTRAL DISTRICT OF CALIFORNIA
26 HONORABLE GEORGE H. WU

27 UNITED STATES OF AMERICA,
28 Plaintiff,
vs.
MICHAEL LERMA, et al.,
Defendants.

Case No.: CR 18-00172-GW
STIPULATION REGARDING THE
FILING OF RULE 29 AND 33
MOTIONS AND THE HEARING ON
POST-TRIAL MOTIONS

Additional Counsel

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Attorneys for Defendant MICHAEL LERMA

1 Defendants Michael Lerma, by and through his counsel of record, Marri B.
2 Derby and Joel Furman, Carlos Gonzalez, by and through his counsel of record,
3 Kenneth M. Miller and Richard Novak, Juan Sanchez, by and through his counsel
4 of record, Charles P. Diamond, Richard P. Lasting and Amy R. Lucas, and Jose
5 Valencia Gonzalez, by and through his counsel of record, Shaun Khojayan and
6 Daniel A. Nardoni, and Assistant United States Attorney Kyle Kahan stipulate to
7 the following deadlines for the filing of post-trial motions:

- 8 1. The defense post-trial motions under Rule 29 and 33 motions will be filed by
9 Monday, July 28, 2025;
- 10 2. The government oppositions to these motions will be filed by Monday,
11 August 25, 2025;
- 12 3. The defense replies to the government's oppositions will be filed by Monday,
13 September 15, 2025; and
- 14 4. The hearing on the defense post-trial motions under Rule 29 and 33 motions
15 will take place on Monday, October 13, 2025.

16
17 Respectfully submitted,

18 IT IS SO STIPULATED

19 Dated: April 1, 2025

s/ Marri B. Deby (with authorization)

20
21 _____
22 Marri B. Derby
23 Joel Furman
24 Attorneys for Defendant
25 Michael Lerma
26
27
28

1 IT IS SO STIPULATED

2 Dated: April 1, 2025

s/ Richard G. Novak (with authorization)

3
4 Kenneth M. Miller
Richard G. Novak
5 Attorneys for Defendant
6 Carlos Gonzalez

7 IT IS SO STIPULATED

8
9 Dated: April 1, 2025

s/ Amy R. Lucas (with authorization)

10
11 Charles P. Diamond
Richard P. Lasting
12 Amy R. Lucas
13 Attorneys for Defendant
Juan Sanchez

14 IT IS SO STIPULATED

15
16 Dated: April 1, 2025

s/ Shaun Khojayan

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18 Shaun Khojayan
Daniel A. Nardoni
19 Attorneys for Defendant
20 Jose Valencia Gonzalez

21 IT IS SO STIPULATED

22
23 Dated: April 1, 2025

s/ AUSA Kyle W. Kahan (with authorization)

24
25 Kyle W. Kahan
Kellye Ng
26 Jason A. Gorn
27 Assistant United States Attorneys
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